

To: Maria Armijo, Esq.
Randy M. Castellano
Assistant United States Attorney
District of New Mexico
Las Cruces Branch Office
555 S. Telshor Blvd., Suite 300
Las Cruces, NM 88011

From: Counsel for defendants Joe Gallegos, Edward Troup, Billy Garcia, Javier Alonso, Arturo Arnulfo Garcia, Jerry Montoya, Daniel Sanchez, Rudy Perez, Anthony Ray Baca, Daniel Archuleta

Re: Disclosures in cases 15-cr-4268, 16-cr-1613 and 15-cr-4275

Date: June 23, 2016

Dear Ms. Armijo and Mr. Castellano,

A review of the discovery reflects that certain items are missing that are required to be produced pursuant Crim. P. 16. These materials may very well be in materials soon to be discovered but in the event they are not, please send them to us as soon as possible.

1. **Recorded statements of all defendants** – Crim. P. 16 (a) (1) (B)

We do not believe we have any recorded statements for the vast majority of the defendants. It is our understanding that during the arrests of defendants who were not in custody an interview was conducted. At a minimum an FBI 302 for all such defendants should exist and be provided.

2. **Prior records of defendants**- Crim. P. 16 (a) (1) (D)

A review of discovery does not reveal the government has provided criminal histories for any of the defendants.

3. **Documents and Objects**- Crim. P. 16 (a) (1) (E)

It is our understanding that arrest warrants, search warrants and/or wiretap applications were issued. Affidavits in support and applications for such searches and/or arrests and inventories of what was seized have not been provided. If these seizures are of items for which the defendants have a property or privacy interest (including but not limited to phone calls, items seized from a home, vehicle searches, etc.) they are required to be produced. Applications and affidavits must be disclosed, as they are material to the preparation of the defense (eg. suppression motions).

Please advise whether or not you agree to produce the above information so that we can avoid litigation for materials in which we are in agreement.

Sincerely,

Brock Benjamin
Richard H. Sindel
Attorneys for Joe Gallegos

Patrick Burke
Cori Harbour-Valdez
Attorneys for Edward Troup

Bob Cooper
James A. Castle
Attorneys for Billy Garcia

Noel Orquiz
Nathan Chambers
Attorneys for Javier Alonso

Billy Blackburn
Attorney for Arturo Arnulfo Garcia

Margaret Strickland
Larry Hammond
Attorneys for Jerry Montoya

Richard E. Jewkes
Amy E. Jacks
Attorneys for Daniel Sanchez

Ryan Villa
Attorney for Rudy Perez

Marc Lowry
Theresa Duncan
Attorneys for Anthony Ray Baca

Ahmad Assed
Attorney for Daniel Archuleta